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Little Elk Creek
Cecil County, Maryland

Area-Wide One Cleanup Program Pilot

Project Action Plan

March 2004

Prepared by EPA Region III

2nd Draft, March 9, 2004

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ACRONYMS

ACOE	Army Corps of Engineers
LRA	Land Revitalization Agenda
LRI	Land Revitalization Initiative
MDE	Maryland Department of Environment
NPL	National Priorities List
OCP	One Cleanup Program
OSWER	Office of Solid Waster and Emergency Response
PA/SI	Preliminary Assessment/Site Investigation
RCRA	Resource Conservation Recovery Act
RPM	Remedial Project Manager
TEI	Triumph Explosives, Inc.

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BACKGROUND

In April 2003, EPA's Office of Solid Waste and Emergency Response (OSWER) announced two closely related initiatives regarding the cleanup and reuse of contaminated sites: the One Cleanup Program (OCP) and the Land Revitalization Initiative (LRI). The One Cleanup Program strives to foster consistent approaches throughout EPA's various cleanup programs. The Land Revitalization Initiative identifies methods to facilitate cleanup and productive reuse of contaminated properties. The two initiatives are mutually supportive with common objectives. The Land Revitalization Agenda (LRA) identifies 60 actions that EPA Regional Offices can champion to facilitate reuse of contaminated properties as part of the cleanup.

Under the LRI, the EPA Regional offices were asked to develop work plans to facilitate cross-programmatic coordination and communication to enhance land revitalization efforts. OSWER's "*Guidelines for Regional Reuse Work Plans*" identified five core national revitalization priorities for each Region to include in its work plan. One of these five priorities is to develop a geographically based pilot project that demonstrates the coordinated use of multiple authorities in cleaning up and facilitating reuse at multiple sites. Each Regional Office was requested to identify a geographic area for an OCP/LRA pilot study. OSWER provided *"Guidelines to Regions for Selecting and Conducting Area-Wide Cleanup Pilot Projects through the One Cleanup Program and Land Revitalization Agenda"* to assist the Regions in this process.

In August 2003, Region III finalized its Land Reuse Work Plan which identifies the Region III Land Revitalization Team, current Regional revitalization efforts and future plans to implement the five core national priorities and actions identified in the LRA. This document presents the action plan for Region III's area- wide cleanup pilot. This action plan identifies the Region III geographic area that will serve as the pilot project study area, program coordination, goals and objectives, required resources and public involvement strategy.

DESCRIPTION OF THE PILOT PROJECT

Regions were encouraged to "design area-wide pilot projects to study and propose solutions to large, complicated sites that cannot easily be solved by using a single program or authority." Region III's Land Revitalization Team developed a potential list of areas to be considered for the area-wide pilot project. Although a number of areas were good candidates, Region III selected an area in northeast Maryland to be an area-wide pilot.

The pilot area is an underutilized industrial park located along the Little Elk Creek in Cecil County, MD just west of the town of Elkton. This area was chosen primarily based on concerns expressed by the Maryland Department of Environment (MDE) about widespread groundwater contamination coming from numerous active and inactive facilities. The area provides an ideal opportunity to promote One Cleanup Program concepts because the facilities in the study area fall under the jurisdiction of different federal and state cleanup programs.

The core area of the pilot project is the Triumph Industrial Park, which has both operating and closed facilities, and other properties surrounding it. Historically, the area was first used as a fireworks and munitions production facility supplying military ordnance for World War II. Since closure of the munitions plant following the war, other manufacturing and industrial operations moved into the area. Dump sites and ordnance related materials have been found in portions of the project area. Several facilities are performing investigations and/or cleanups under EPA's or the State's Superfund and Resource Conservation and Recovery Act (RCRA) cleanup programs. The U.S. Army Corps of Engineers (ACOE) has identified portions of the target area as Formerly Used Defense Sites (FUDS).

Groundwater investigations show widely distributed volatile organic contamination throughout the pilot area. **PCE, TCE and perchlorate are the primary groundwater contaminants of concern in the area.??** The groundwater contamination may also be impacting surface water and sediment quality in the Little Elk Creek. Because the Little Elk Creek flows through the core of the industrial area, the name chosen for the pilot is "The Little Elk Creek Area-Wide One Cleanup Program Pilot."

The industrial park is strategically located along the I-95 corridor, but underutilized because of contamination issues. Groundwater contamination in this area may be hampering development of the region. Unemployment in the area is high (**?%**) and reuse of this industrial area would improve job opportunities for the community. Properties surrounding the industrial areas are also sought for residential growth. Better understanding of the groundwater contamination in the area is needed to assist residential development efforts.

Geographic Description of the Pilot Area

Please refer to the map in Appendix 1 for a visual representation of the pilot project area. Appendix 2 contains a listing of all sites and facilities that are part of the pilot investigation.

The pilot area borders the western edge of the town of Elkton Maryland. It includes the geographic boundaries of the former Triumph Explosives, Inc (TEI)

plant and areas to the south and west of the TEI property. Parcels of the former TEI property are currently owned by several owners. The TEI property is bounded by Laurel Run and Nottingham Road to the west, I-40 to the south, Zeitler Road to the north and the town of Elkton to the east. The project area also includes two fireworks manufacturing facilities and associated dump site south of the TEI property and I-40, and the Sand, Gravel and Stone Superfund site, located about 1 mile west of the TEI property. The Little Elk Creek flows directly through the center of the TEI property. Total acreage of the pilot project area is estimated at **xxxx.**

PROJECT COORDINATION

The purpose of the Little Elk Creek area-wide pilot project is to promote cross-program coordination, planning and ideas about cleanup and reuse of contaminated areas. Representatives of EPA Region III's and MDE's cleanup programs will work together as a team to identify long term goals and short term objectives for the Little Elk Creek project. This EPA/MDE team will establish goals and objectives and measures of success for the pilot project and track progress and report accomplishments and lessons learned.

MDE and EPA met on January 28, 2004 to delineate the geographic scope of the project and to identify the target facilities that would be reviewed as part of the pilot. The team recommended forming two workgroups to focus on different aspects of the project: a Technical Workgroup and a Land Revitalization Workgroup.

The focus of the Technical Workgroup is to share data and information to gain a comprehensive understanding of groundwater flow, contaminant sources and extent, and potential exposure pathways. Site managers, geologists and risk assessors will form the core of the Technical Workgroup. Art O'Connell (MDE) and Deb Goldblum (EPA) will co-lead the Technical Workgroup.

The focus of the Revitalization Workgroup is to coordinate with the community and ensure that cleanup efforts work in concert with redevelopment needs for the area. The Revitalization Workgroup will be co-led by Kristeen Gaffney (EPA) and Karl Kalbacher (MDE).

PARTICIPATING PROGRAMS AND CONTACTS

EPA Region III

Superfund Contacts:
- Peter Ludzia, Section Chief, Remedial program
- Deb Rossi, RPM, Sand Gravel and Stone site
- Kristeen Gaffney, Land Revitalization and Brownfields Redevelopmnet
- Lorie Baker, Site Assessment Manager

RCRA Contacts:
- Bob Greaves, Branch Chief, RCRA General Operations
- Deb Goldblum, RCRA Redevelopment
- Barbara Smith, RPM, GE Railcar site
- Linda Holden, RPM, ATK Tactical Systems/Thiokol site

Watersheds:
- Bernice Pasquini

Federal Facilities:
- Paul Leonard, Section Chief, Federal Facilities
- Mark Stephens, FUDS Coorinator

Chesapeake Bay Program

Maryland Department of Environment

Hazardous Waste Program:
- Butch Dye

Environmental Restoration and Redevelopment Program
- Karl Kalbacher
- Art O'Connell
- Mark Alex Cox
- Eugene Dejoise

Water Management Administration

County Participation

To be determined. The Cecil County Health Department will be consulted on environmental conditions and site specific cleanup issues. The Cecil

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County Offices of Economic Development and Planning, Zoning, Parks & Recreation will be consulted on the community's development plans for the target area.

Community Participation

To be determined.

GOALS AND OBJECTIVES

The goal of the Little Elk Creek pilot project is develop a collaborative, cross-programmatic approach to address the groundwater contamination problem and support development and reuse needs of the surrounding community. The focus of this project will be on re-utilization of the industrial area with an effort to cleanup as much contamination as possible with the available resources provided and protect public health.

Long-term Objectives

The long-term objectives for the Little Elk Creek pilot project are to:

- Create a collaborative working environment between state and federal cleanup programs to address a widespread contamination problem affecting multiple properties.
- Educate EPA and State agency staff on the One Cleanup Program and Land Revitalization principles and incorporating these principles into the pilot project.
- Synthesize data analysis from different types of environmental studies and assessments to establish common cleanup goals and standards for all sites in the area.
- Investigate innovative approaches to address liability concerns across a multi-site area.
- Prioritize cleanup activities to meet the community's needs for reuse of the area.
- Establish short and long term measures of success.
- Create a webpage to showcase progress.

Short-term Objectives and Tasks:

The following short term objectives and tasks will be conducted to support the long term project objectives identified above:

1. The Technical Workgroup will analyze data from site investigations to identify cross contamination issues and to develop understanding of the overall groundwater contamination problem facing the geographic area. The Technical Workgroup will make recommendations on cleanup priorities in the area and share cleanup approaches applied for each site.

   Tasks:
   - Review existing data from site investigations.
   - Organize data and technical information into a common format.
   - Evaluate pathways of exposure.
   - Prepare a fact sheet summarizing groundwater conditions in the project area and recommend additional sampling to fill data gaps.
   - Prioritize investigations and cleanups based on both protection of human health and environmental conditions and community reuse needs.
   - Ensure coordination of cleanup activities.
   - Coordinate with the ACOE as necessary on site cleanup activities.

2. The Revitalization Workgroup will engage the local community to ensure that community redevelopment needs are incorporated into the cleanup process. The Revitalization Workgroup will keep the community updated and informed on progress of the pilot.

   Tasks:
   - Contact the Cecil County Health Department and the Cecil County Offices of Economic Development and Planning, Zoning, Parks & Recreation to discuss the pilot project.
   - Identify community groups, including development and industrial interests, environmental groups, local officials and neighborhood associations and solicit their input into the goals of the project and the action plan.
   - Review long range zoning and development plans for the area.
   - Investigate development opportunities for the area and identify ways to foster reuse for the community development plans for the target area
   - Develop a public participation plan including press events, fact sheets, website, etc to publicize our successes and to encourage participation in the pilot.
   - Counsel the community on sources of federal and state funding or

other forms of assistance to support the cleanup and redevelopment of contaminated sites.

3. The Technical Workgroup and Revitalization Workgroup will work together to identify potential approaches to address liability concerns across a multi-site area.

   Tasks:
   - Review "Ready for Reuse" technical determinations piloted in other EPA Regions. Consider adaptation for a multi-site area.
   - Prepare Ready for Reuse technical determinations for suitable sites in the area either during or post cleanup.

4. Establish a regular schedule of meetings to discuss the status and progress of each site and to make sure individual actions are in-line with the overall goals. The purpose of these meetings are to provide a forum to promote cross-programmatic communication and to discuss expectations for each action (e.g., cleanup objectives, work schedules, institutional controls, reuse needs, etc).

5. A final report will be written to summarize findings and lessons learned on One Cleanup Program approaches from the pilot study.

PROJECT SCHEDULE

Project Task	Target Due Date	Who
Review existing technical data	March 10, 2004	Technical Workgroup
First coordination meeting; identify data gaps	March 2004	Technical Workgroup
Establish a project meeting schedule	March 2004	Technical Workgroup
Meet with County to discuss pilot project	March 2004	Revitalization Workgroup
Develop a community involvement plan	April 2004	Revitalization Workgroup
Develop a webpage on EPA Region III's website	May 2004	Revitalization Workgroup

Project Task	Target Due Date	Who
Review long range development plans for the area	May 2004	Revitalization Workgroup
Develop a common data platform and shared database to store data.	June 2004	Technical Workgroup
Prepare a fact sheet on groundwater conditions in the area	September 2004	Technical Workgroup
Prioritize investigations and cleanups in the area to focus resources	September 2004	Technical Workgroup
Prepare "Ready for Reuse" Technical Determinations for sites during and post cleanup	As appropriate	Technical Workgroup
Prepare Final Report	?	Revitalization Workgroup

MEASURES OF SUCCESS

1. Number of human health exposures to contaminants reduced (number of persons or number of wells)
2. Number of releases of contaminants from identified sites to the Little Elk Creek watershed reduced.
3. Number of acres of contaminated sites in the pilot area used productively.
4. Number of jobs created or retained in the pilot area associated with reuse of contaminated sites.
5. Number of residential housing units constructed on or near contaminated sites.
6. Number of sites which can show human exposures to contamination are "under control".
7. Number os sites which can show migration of contaminated groundwater is under control.

PROJECT FUNDING

The Technical Workgroup will identify additional sampling or technical needs for the project. Existing state and federal program staffing and resources will be considered first to meet funding needs. If additional funding sources are needed, the following potential sources could be considered:

Federal Resources

EPA Regional Geographic Initiative and Discretionary Funds
OSWER Innovative Pilot Funds
EPA's Office of Research and Development (research assistance)
Brownfields assessment and cleanup grants
Army Corp of Engineers (technical assistance)

State Resources

Priority Funding Areas
Rural Legacy Program
Brownfields Revitalization Program
Live Near Your Work Program
Job Creation Tax Credit Program

Local and Private Resources

Facilities and Responsible Parties??
Additional funding resources will be researched and investigated (e.g. local area tax credits)